



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

February 1, 2023

By ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

[Signature]
John G. Koeltl, U.S.D.J.

2/8/23

Re: *Keefe v. Federal Bureau of Investigation*, No. 21 Civ. 5450 (JGK)

Dear Judge Koeltl:

This Office represents Defendant Federal Bureau of Investigation ("FBI") in the above-captioned action, which Plaintiff brings pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"). I write on behalf of both parties, to provide a status update and request that the status conference scheduled for February 16, 2023, be adjourned.

As noted in our letter correspondence of September 6, 2022, ECF No. 21, the parties resolved their dispute concerning the payment of duplication fees. The FBI continues to process approximately 500 responsive pages each month and, as of today's date, has produced to Plaintiff 5,639 pages of non-exempt records.

Because production remains ongoing, the parties respectfully request that they be permitted to provide a further status update to the Court on or before June 1, 2023 and that, to conserve judicial resources, the status conference scheduled for February 16 be adjourned sine die.

We thank the Court for its consideration.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendant

By: /s/ Jessica F. Rosenbaum
JESSICA F. ROSENBAUM

Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Telephone: (212) 637-2777
E-mail: jessica.rosenbaum@usdoj.gov